

October 10, 2002

Ms. Marlene Dortch Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

**Re: EX PARTE** 

In the Matter of Qwest Communications International, Inc. Consolidated Application for Authority to Provide In-Region, InterLATA Services in Colorado, Idaho, Iowa, Nebraska, North Dakota, Montana, Utah, Washington, and Wyoming, WC Docket No. 02-314

Dear Ms. Dortch:

On October 9, 2002, Sherry Lichtenberg and I of WorldCom, and Marc Goldman of Jenner & Block, met with the following members of the Wireline Competition Bureau to discuss the above-referenced proceeding: Michael Carowitz, Marcy Greene, Sharon Lee, Michael Engel, and Gail Cohen. We discussed deficiencies and complexities in Qwest's OSS that do not exist in any other region, that act as a significant barrier to local competition, and that are grounds for denying Qwest's section 271 applications. These deficiencies include Qwest's failure to provide migrate by name and telephone number and industry-standard migrate-as-specified; Qwest's sending of rejects after FOCs; Qwest's returning of multiple customer service records for one telephone number; and Qwest's stand-alone test environment (SATE) not mirroring production. We also raised concerns about whether Qwest's newly created separate long distance affiliate should be deemed in compliance with section 272 of the Act.

Please call me with any questions about this matter.

Sincerely, /s/ Lori E. Wright Associate Counsel Federal Advocacy cc: M. Carowitz; G. Remondino; M. Cohen, R. Harsch; J. Jewel; P. Baker; C. Post; B. Smith; Y. Dori; J. Myles; S. Vick; J. Orchard; S. Oxley; ND PSC; WA UTC; W. Dever; R. McDonald; G. Cohen; P. Megna; J. McKee; M. Carey; P. Silberthau; D. Harrold; S. Diskin; S. Lee; M. Greene